

BOIES SCHILLER FLEXNER LLP  
Richard J. Pocker (NV Bar No. 3568)  
300 South Fourth Street, Suite 800  
Las Vegas, NV 89101  
Telephone: (702) 382-7300  
Facsimile: (702) 382-2755  
rpocker@bsfllp.com

BOIES SCHILLER FLEXNER LLP  
William Isaacson (*pro hac vice*)  
Karen Dunn (*pro hac vice*)  
1401 New York Avenue, NW, 11th Floor  
Washington, DC 20005  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131  
wisaacson@bsfllp.com  
kdunn@bsfllp.com

BOIES SCHILLER FLEXNER LLP  
Steven C. Holtzman (*pro hac vice*)  
Beko O. Reblitz-Richardson (*pro hac vice*)  
1999 Harrison Street, Suite 900  
Oakland, CA 94612  
Telephone: (510) 874-1000  
Facsimile: (510) 874-1460  
sholtzman@bsfllp.com  
brichardson@bsfllp.com

MORGAN, LEWIS & BOCKIUS LLP  
Benjamin P. Smith (*pro hac vice*)  
John A. Polito (*pro hac vice*)  
Sharon R. Smith (*pro hac vice*)  
One Market, Spear Street Tower  
San Francisco, CA 94105  
Telephone: 415.442.1000  
Facsimile: 415.442.1001  
benjamin.smith@morganlewis.com  
john.polito@morganlewis.com  
sharon.smith@morganlewis.com

ORACLE CORPORATION  
Dorian Daley (*pro hac vice*)  
Deborah K. Miller (*pro hac vice*)  
James C. Maroulis (*pro hac vice*)  
500 Oracle Parkway, M/S 5op7  
Redwood City, CA 94070  
Telephone: 650.506.4846  
Facsimile: 650.506.7114  
dorian.daley@oracle.com  
deborah.miller@oracle.com  
jim.maroulis@oracle.com

*Attorneys for Plaintiffs Oracle USA, Inc.,  
Oracle America, Inc. and Oracle International  
Corp.*

GIBSON, DUNN & CRUTCHER LLP  
Mark A. Perry (*pro hac vice*)  
1050 Connecticut Avenue, N.W.  
Washington, DC 11101  
Telephone: (202) 955-8500  
mperry@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP  
Jeffrey T. Thomas (*pro hac vice*)  
Blaine H. Evanson (*pro hac vice*)  
Joseph A. Gorman (*pro hac vice*)  
Casey J. McCracken (*pro hac vice*)  
3161 Michelson Drive  
Irvine, CA 92612-4412  
Telephone: (949) 451-3800  
jtthomas@gibsondunn.com  
bevanson@gibsondunn.com  
jgorman@gibsondunn.com  
cmccracken@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP  
Samuel G. Liversidge (*pro hac vice*)  
Eric D. Vandavelde (*pro hac vice*)  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: (213) 229-7000  
sliversidge@gibsondunn.com  
evandavelde@gibsondunn.com

RIMINI STREET, INC.  
Daniel B. Winslow (*pro hac vice*)  
6601 Koll Center Parkway, Suite 300  
Pleasanton, CA 94566  
Telephone: (925) 264-7736  
dwinslow@riministreet.com

RIMINI STREET, INC.  
John P. Reilly (*pro hac vice*)  
3993 Howard Hughes Parkway, Suite 500  
Las Vegas, NV 89169  
Telephone: (336) 402-4068  
jreilly@riministreet.com

HOWARD & HOWARD ATTORNEYS  
W. West Allen (Nevada Bar No. 5566)  
3800 Howard Hughes Parkway, Suite 1000  
Las Vegas, NV 89169  
Telephone: (702) 667-4843  
wwa@h2law.com

*Attorneys for Defendants Rimini Street, Inc.,  
and Seth Ravin*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ORACLE USA, INC.; a Colorado corporation; ORACLE AMERICA, INC.; a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation; and SETH RAVIN, an individual,

Defendants.

CASE NO. 2:10-cv-0106-LRH-VCF

**JOINT STIPULATION TO MODIFY  
SCHEDULE FOR CERTAIN POST-  
INJUNCTION PROCEEDINGS**

Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp. (together, “Oracle”) and Defendants Rimini Street, Inc. and Seth Ravin (together, “Rimini”) (collectively, “Parties”) jointly submit this Stipulation and [Proposed] Order.

WHEREAS, on November 22, 2019, the court entered a minute order setting certain deadlines in this case, including a close of expert discovery on March 27, 2020, a deadline to file a motion for order to show cause on April 15, 2020, a deadline to file an opposition on May 6, 2020, and a deadline to file a reply on May 20, 2020, ECF 1289;

WHEREAS, the extraordinary COVID-19 pandemic has placed many attorneys for both Oracle and Rimini under mandatory shelter-in-place orders which prohibit Non Essential travel. *See, e.g.*, Order of the Health Office No. C19-07, City of San Francisco, Department of Public Health (*available at* <https://www.sfdph.org/dph/alerts/files/HealthOrderC19-07-%20Shelter-in-Place.pdf>); Order of the Health Officer of the County of Santa Clara, County of Santa Clara Public Health Department (*available at* <https://www.sccgov.org/sites/phd/DiseaseInformation/novel-coronavirus/Documents/03-16-20-Health-Officer-Order-to-Shelter-in-Place.pdf>); Order of the Health Officer of the County of San Mateo, San Mateo County Health (*available at* <https://www.smcgov.org/sites/smcgov.org/files/HO%20Order%20Shelter%20in%20Place%20200316.pdf>);

WHEREAS, this COVID-19 pandemic and related orders creates significant concerns that depositions in this matter can be held legally, safely and efficiently;

WHEREAS, the Parties agree to extend the deadlines in this case as described below, pending approval by the Court; and

WHEREAS, the Parties agree to monitor the COVID-19 situation and to promptly advise the Court regarding the need for any further adjustments to the schedule;

THEREFORE, the Parties stipulate, and request that the Court order, that the deadlines in this case be reset as follows:

Event	Dkt. 1289 deadline	Proposed new deadline
Close of expert discovery	March 27, 2020	May 8, 2020
OSC motion due	April 15, 2020	May 27, 2020
OSC opposition due	May 6, 2020	June 17, 2020
OSC reply due	May 20, 2020	July 1, 2020

Dated: March 18, 2020

Dated: March 18, 2020

MORGAN, LEWIS & BOCKIUS LLP

GIBSON, DUNN & CRUTCHER LLP

By: /s/ John A. Polito  
John A. Polito

By: /s/ Eric D. Vandavelde  
Eric D. Vandavelde

*Attorneys for Plaintiffs Oracle USA, Inc.,  
Oracle America, Inc., and Oracle  
International Corporation*

*Attorneys for Defendants Rimini Street, Inc.,  
and Seth Ravin*

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Dated: March 18, 2020

By: /s/ John A. Polito  
John A. Polito

*Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation*

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DATED: March 18, 2020

By: /s/ John A. Polito  
John A. Polito

*Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ORACLE USA, INC.; a Colorado corporation;  
ORACLE AMERICA, INC.; a Delaware  
corporation; and ORACLE INTERNATIONAL  
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RIMINI STREET, INC., a Nevada corporation;  
and SETH RAVIN, an individual,  
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Case No 2:10-cv-0106 LRH VCF

**ORDER RE: JOINT  
STIPULATION TO MODIFY  
SCHEDULE FOR CERTAIN  
POST-INJUNCTION  
PROCEEDINGS**

**ORDER**

**IT IS ORDERED** that the deadlines for post-injunction proceedings are reset as follows:

Event	Dkt. 1289 deadline	New deadline
Close of expert discovery	March 27, 2020	May 8, 2020
OSC motion due	April 15, 2020	May 27, 2020
OSC opposition due	May 6, 2020	June 17, 2020
OSC reply due	May 20, 2020	July 1, 2020

**IT IS SO ORDERED:**



Hon. Cam Ferencbach  
United States Magistrate Judge

Dated: March 20, 2020